

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 1:22-cr-00096-7-CKK

D1, CALVIN ZASTROW  
D2, CHESTER GALLAGHER  
D3, HEATHER IDONI  
D4, CAROLINE DAVIS  
D5, JOEL CURRY  
D6, JUSTIN PHILLIPS  
D7, EVA EDL  
D8, EVA ZASTROW

Defendants.

/

**AFFIDAVIT IN SUPPORT OF DEFENDANT'S  
PROPOSED INSTRUCTION ON  
DEFENSE OF A THIRD PERSON**

STATE OF MICHIGAN                    )  
    ) -ss-  
COUNTY OF BAY                            )

AFFIANT, HEATHER IDONI, deposes and says:

Affiant deposes as follows:

1. That on October 22, 2020 she was at the abortion clinic in the District of Columbia and she was ultimately arrested leading to the charges in this case.
2. That she was at the clinic as a matter of conscience based on deeply held religious beliefs, but also believe that based on science, unborn children contained within the women entering the clinic are legal persons.
3. That she has been advised by her counsel that she has a constitutional right under the Fifth Amendment of the Constitution to refrain from testifying at her trial.
4. That after being so informed, and considering the matter, she has decided that she will testify and explain to the jury that she was at the abortion clinic, for the purpose of praying and attempting to verbally dissuade the women from destroying their unborn children that she reasonably believed were legal persons based on her information, belief and research into the matter. . That she will intend to testify that she believes unborn children are legal persons.
5. That she intends to testify that she believes unborn children are legal persons from the point of conception, and also because within one month after conception, science indicates that the children have a heartbeat and brain waves. She will also testify that based upon her information and belief the women coming into these clinics for abortions do so after the first month after conception.

Dated: April 17, 2023

  
Heather Idoni  
HEATHER IDONI

Further deponent sayeth not.